

COPY

Office of the Mayor

November 29, 2001



Docket Coordinator, Headquarters
U. S. Environmental Protection Agency
CERCLA Docket Office
1235 Jefferson Davis Highway
Crystal Gateway #1, First Floor
Arlington, VA 22202

RE: Comments of the Village of Cahokia, Illinois Regarding the Proposed
Listing of the Sauget Area 1 and 2 Superfund Sites

These comments are respectfully submitted by the Village of Cahokia, Illinois in response to the proposal by the United States Environmental Protection Agency ("EPA") to list the "Sauget Area 1" and "Sauget Area 2" sites on the National Priorities List ("NPL"). See 66 Fed. Reg. 47612 (September 13, 2001). Both of these sites are located in part in the Village of Cahokia, Illinois.

The Sauget Area 1 sites include portions of Dead Creek and a borrow pit/wetlands area just south east of the Cahokia Village Hall. The southern tip of the Sauget Area 2 Sites is located in Cahokia.

SAUGET AREA 1 SITES

In 1996, when the EPA proposed Sauget Area 1 for listing, the Village of Cahokia approved of the listing because at that point in time, contamination in the Village, which had been known to be there for many years, was not being addressed. Based on statements of the EPA, we understand that many of the industries and businesses located near or on Dead Creek, discharged their wastes directly into the Creek beginning in the early 1900's when such discharges were not considered to be a problem. The potential problems that the creek presented because of these discharges became known in the late 1970's. The Village has attempted numerous times over the years to get the government to address the problems of the creek, but to no avail. Even after the 1996 proposed listing, several years passed before any activity to actually address the creek began.

Then, in 1999 the Village began to see progress, EPA asked Solutia to undertake a large study of the Sauget Area 1 Sites to determine the actual extent of contamination in our

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community from Dead Creek. Solutia agreed to undertake and finance this work. Solutia representatives were most present in the community: sampling the creek, nearby yards and wetlands. The community was kept well informed by Solutia through town hall meetings, press releases and newsletters.

In 2000, Solutia agreed with EPA to undertake the actual work to get the sediments out of the creek, despite the fact that the study of Area 1 Sites was not complete. Since then, we have seen pipes go in along the creek and finally, this summer, sediment removal taking place. We understand that the work that has been done, with USEPA oversight/approval, is due to be complete by summer of 2002.

Based on the information we have received from EPA, the Solutia study determined that the residential properties along the creek were not contaminated from the creek sediment. We also understand that once the creek sediment is removed the risk of exposure from the Area 1 sites within Cahokia will have been substantially reduced or eliminated from our community. No additional, unacceptable residential risks have been identified in the recent Human Health Risk Assessment for Area 1.

We have been anxiously awaiting the removal of all the creek sediment so that new plans for area redevelopment can be facilitated. The cleanup is near an end, and we are excited about the redevelopment potential. To learn now that an NPL listing is proposed for Area 1, including segments of Dead Creek already cleaned or near to being completed, is both confusing and upsetting.

As the new mayor for the Village of Cahokia for the past several months, I am earnestly working with community business leaders, area legislators and our village population on four major projects in our community. All of the projects are in planning stages with early 2002 initiation dates. All of the projects are certain to have a most positive impact on this historic community (established in 1699) which is so in need of an economic revival.

I am genuinely concerned for the negative impacts that the NPL listing could have on this community. It is clear to us that the listing will put potential investors on notice that EPA thinks the Area 1 Sites are among the worst environmental problems in the country and that they need further action. This listing will only result in investors, redevelopers and homebuyers looking elsewhere from the Cahokia area for their home and business needs. EPA cannot dispute that NPL listings have a negative impact on communities from a redevelopment perspective. Despite this, the agency is trying to list our community, when none of its stated purposes are met. We ask that the agency seriously reconsider the impact its listing of Area 1 will have on the Village of Cahokia for the portion of Area 1 that falls within the boundary of the village. We request that the EPA consider redefining Area 1 to exclude the segments of the creek and other sites that fall within the boundary of Cahokia. The Village of Cahokia fails to see the purpose of the proposed listing at this point in time. While such a listing may be needed for the remaining sites in Sauget, the Cahokia portion of Area 1 clearly no longer requires such a designation, in our opinion and in the opinion of independent environmental consultants. There is a cost

for this kind of listing, without any commensurate benefits. It is our understanding that parties who are potentially responsible for the contamination have already been notified and are well aware of the status of both the sites.

I might add that I am truly dismayed as the Mayor of the Village of Cahokia that I was not officially informed of the proposed listing, which I have since discovered was listed on the Federal Register: September 13, 2001.

I would hope that this urgent letter would serve and be accepted as official comment, even though I was informed by USEPA on November 13th that the deadline for the NPL comment period was on November 13th.

Respectfully submitted,

A handwritten signature in cursive script that reads "Denita Reed". The signature is written in black ink and is positioned above the printed name and title.

Denita Reed
Mayor

DR:lls

c: Christie Todd Whitman, Administrator USEPA
David A. Ullrich, Deputy Regional Administrator USEPA
William Muno, Director Superfund Division – S-6J
Renee Cipriano, Director IEPA
Governor George H. Ryan
U.S. Senator Richard J. Durbin
U.S. Senator Peter G. Fitzgerald
U.S. Representative Jerry Costello
State Senator James F. Clayborne, Jr.
State Senator Dave Luechtefeld
State Representative Wyvetter Younge
State Representative Dan Reitz